



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1701 SOUTH FIRST STREET, SUITE 1000, CHICAGO, ILLINOIS 60615

THOMAS V. SKINNER, DIRECTOR

708/338-7900
708/338-7752 (Fax)

R. Lavin & Sons
2028 N. Sheridan Road
North Chicago, IL 60064

Re: LPC #0971250007-Lake County
R. Lavin & Sons
ILD097271563
Compliance File

Dear Mr. Caldwell:

A inspection of your facility was conducted on October 26, 1999 by Mark Retzlaff of the Illinois Environmental Protection Agency. The purpose of this re- inspection was to determine your facility's compliance status with respect to the apparent violation(s) cited in previous Agency inspections.

During this inspection it was determined that your facility had returned to compliance with the apparent violation(s) of Section 703.121a. Please note, although your facility has returned to compliance for this apparent violation(s), the Illinois EPA reserves the right to pursue further enforcement.

For your information, a copy of the inspection report is enclosed. Should you have any questions regarding this inspection, please contact Mark Retzlaff at 708/338-7900.

Sincerely,

Clifford Gould,
Regional Manager
Field Operations Section
Bureau of Land

CG:MR:dfa:Lavin.ltr.2

Enclosure

US EPA RECORDS CENTER REGION 5



400206



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

6701 South East Street, Maywood, Illinois 60153

THOMAS A. SKINNER, DIRECTOR

708/338-7900
708/338-7752 (Fax)

DEC 02 1999

R. Lavin & Sons
2028 N. Sheridan Road
North Chicago, IL 60064

Re: 0971250007 -- Lake County
R. Lavin & Sons
Compliance File

Dear Mr. Caldwell:

On October 26, 1999, an inspection of the above referenced site was conducted by Mark Retzlaff representing the Illinois Environmental Protection Agency. The purpose of the inspection was to determine if the site was in compliance with the applicable requirements of the Illinois Environmental Protection Act and 35 Illinois Administrative Code Part 722 A-D.

At the time of this inspection, no violations were noted. A copy of the inspection report is enclosed. Should you have any questions concerning this inspection, please contact Mark Retzlaff at 708/338-7900.

Sincerely,

A handwritten signature in cursive script, reading "Clifford Gould".

Clifford Gould, Regional Manager
Field Operations Section
Bureau of Land

CG:MR:dfa:Caldwell.ltr.1

Enclosure

RCRA INSPECTION REPORT

USEPA ID #:	ILD 097271563	IEPA ID #:	0971250007
Facility Name:	R. Lavin + Sons	Phone #:	847 689 4300
Location:	3028 N. Sheridan Road	County:	Lake
City:	North Chicago	State:	Illinois
Region:	2	Zip Code:	60064
	Inspection Date:	10/26/99	Time: 10:00-12:00pm
Weather:	Clear, 55°F		

Notified As: G Regulated As: G (S) (D)

ICEI: ☒ CME/O&M: ☐ CSI: ☐ NRR: ☐ F/U to: / / CCI: ☐ PIF: ☐ CVI: ☐ CSE: ☐ CAO: ☐ Other: ☐

(Notification Date: / / (initial) 3/25/97 (subsequent))

Part A Date: 2/3/91 Amended: / / Withdrawn: / /

Part B Submitted/Issued (circle one): / /

Has the company been referred to: USEPA: / / IAGO: 3 / 3 / 89 County State's Attorney: / /

CACO: / / CAFO: / / Federal Court Order: / /

Consent Decree: 10/12/90 IPCB Order: / / State Court Order: / /

Amended 2-7-92

Amended 3 27 97

[illegible]

OWNER		OPERATOR	
Name: R. Lavin + Sons		Name: R. Lavin + Sons	
Address: 3426 S. Kedzie		Address: 2023 N. Sheridan Road	
City: Chicago		City: North Chicago	
State: Illinois	Zip Code: 60623	State: Illinois	Zip Code: 60064
Phone #: 773-847-1800		Phone #: 347 689-4300	
PERSON(S) INTERVIEWED		TITLE	PHONE #
Dennis Caldwell		Env Coord.	847 689 4300
INSPECTION PARTICIPANT(S)		AGENCY/DIVISION	PHONE #
Mark Retzlaff		EPA /BOL	708 338-7900
PREPARED BY		AGENCY/DIVISION	PHONE #

SUMMARY OF APPARENT VIOLATIONS

[illegible][illegible][illegible]

WASTE DISPOSITION FORM

[illegible]

• All "FOI" responses must be explained in narrative

R. Lavin & Sons, Inc. (NCRS)
0971250007 - ILD097271563
October 26, 1999

NARRATIVE

North Chicago Refiners & Smelters (NCRS), a division of R. Lavin and Sons, Inc., is a secondary copper and brass recovery facility. Scrap copper and brass in many forms are imported from off-site, melted and refined in furnaces, then poured into ingots which are shipped to customers.

Hazardous Waste

Furnace Brick Waste - D007, D008

- brick lining removed from furnaces during routine maintenance
- generate approximately 40 tons per month (this waste is generated at a more consistent basis than the Cupola Flue Dust)
- last manifested shipment on 9-1-99 to AETS, Menomonee Falls, WI
- approximately 15 yd³ on site

Cupola Flue Dust Waste - D008

- clean out of slag recycling cupola furnace - remove metallic oxides from the flue
- generate approximately 25 tons per month
- last manifested shipment on 7-19-99 to AETS, Menomonee Falls, WI
- approximately 15 yd³ on site

Waste Petroleum Naphtha - D001

- from 2 parts washers
- generate approximately 45 gallons every 3 months
- last manifested shipment on 8-18-99 to Safety Kleen, Elgin, IL
- none on site

Non-Regulated Waste

Wastewater treatment sludge - D008

- from filter press - contains 40-50% zinc which is reused in the smelting process to recover the metal - for this reason, it is not considered a solid waste
- generate approximately 15,000 pounds/year
- material is consumed in an on-site furnace.
- approximately ½ yd³ on site

R. Lavin & Sons, Inc. (NCRS)
0971250007 - ILD097271563
October 26, 1999

Regulated Hazardous Waste Units

S03 - Hazardous Waste Piles

The waste piles at this facility no longer physically exist. See additional notes below for further information.

S04 - Surface Impoundment

The north surface impoundment was dredged and backfilled in the spring of 1991, therefore, this unit no longer physically exists either. See additional notes below for further information.

Accumulation Areas

- Furnace brick is accumulated in metal bins in a warehouse at the west end of the facility..
- Cupola flue dust is initially accumulated in a box at baghouse #4 (considered in-process) then placed in a roll off box located in a metal shed at the south end of the facility.

Additional Notes

NCRS submitted a certification of closure for the S03 & S04 units in November of 1996. The waste piles and surface impoundment were paved over and closed as one disposal unit (see Areas A, B, C, and D on site sketch). A closure verification inspection was conducted on December 12, 1996 in which the units appeared to be closed in accordance with the closure plan. **Final closure was approved in an Agency letter dated July 29, 1999.**

Slag resulting from the refining and smelting process is accumulated in piles on site. This material is either processed through the cupola blast furnace, or sent to an off site for metal reclamation. If the slag is processed on site, the following occurs:

- 1) slag is placed in the shaker to break it up,
- 2) the large pieces are put into the cupola blast furnace to extract metals,
- 3) the metals recovered from the cupola furnace are put back into the process furnaces,
- 4) the excess slag is used as road base, and
- 5) the flue dust and fines are disposed of as hazardous waste.

The use of the shaker began in late 1997. It has not yet been determined whether shaking, as opposed to dropping, has decreased the amount of cupola flue dust generated as previously hoped.

R. Lavin & Sons, Inc. (NCRS)
0971250007 - ILD097271563
October 26, 1999

NCRS is currently operating under a consent decree which was negotiated between the facility, the IEPA, the USEPA, and the IAGO. NCRS appears to be a fully regulated generator of hazardous waste, and will remain on record as an inactive storage and disposal facility in post closure care.

Waste Minimization

Wastewater treatment sludge is reused in the smelting process to recover metal.

The Following Violation is considered resolved based on a resolution of the 10-12-90 Consent Order. Also based on an Agency approved closure certification letter dated 7-29-99, and input from Jim Moore of RCRA Permits Section.

703.121(a) - No RCRA Permit for the hazardous waste management units. (Note: This violation was originally cited during the 8/4/87 RCRA inspection).
Resolved



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1701 SOUTH FIRST STREET, MAYWOOD, ILLINOIS 60153

THOMAS V. SKINNER, DIRECTOR

MEMORANDUM

DATE: November 15, 1999
TO: Cliff Gould, BOL/FOS
FROM: Mark Retzlaff, BOL/FOS *MR*
SUBJECT: 0971250007 - Lake
R. Lavin & Sons, Inc.
ILD097271563

→ 217-524-3295

On November 15, 1999, I spoke to Jim Moore of RCRA Permits Section regarding the above referenced site. On October 26, 1999, I conducted a RCRA inspection at the facility and felt that outstanding violation 703.121(a) could be resolved.

Moore felt that with the resolution of the 10-12-90 Consent Order filed with the Board, and the approved closure certification (7-29-99), that this adequately addressed all outstanding issues with the Agency. That R. Lavin & Sons would remain in post closure care status.

Moore stated that he did not have any problems with me completing a SOV sheet resolving 703.121(a).

cc: Mark Retzlaff
Division File